

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
(Indianapolis Division)**

RED BARN MOTORS, INC.,	*	DOCKET NO. 1:14-cv-01589-TWP-DKL
PLATINUM MOTORS, INC.,	*	
MATTINGLY AUTO SALES, INC.,	*	
YOUNG EXECUTIVE MANAGEMENT *		
& CONSULTING SERVICES, INC.,	*	
Individually, and on behalf of other	*	
members of the general public	*	
similarly situated	*	
	*	
v.	*	
	*	
COX ENTERPRISES, INC.,	*	
COX AUTOMOTIVE, INC.,	*	
NEXTGEAR CAPITAL, INC.,	*	
F/K/A DEALER SERVICES	*	
CORPORATION, successor by merger	*	
with Manheim Automotive Financial	*	
Services, Inc., and JOHN WICK	*	
	*	

## UNOPPOSED MOTION FOR EXTENSION OF TIME

**NOW INTO COURT**, pursuant to Local Rule 6-1, come Plaintiffs, Red Barn Motors, Inc.,  
Platinum Motors, Inc., Mattingly Auto Sales, Inc., and Young Executive Management &  
Consulting Services, Inc., who respectfully request an extension of time in which to file an  
opposition to the Defendants' Motion to Dismiss (Rec. Doc. No. 126).

On April 15, 2016, the Defendants filed a lengthy Motion to Dismiss with accompanying memorandum. Rec. Doc. No. 126 & 127. Accordingly, pursuant to Local Rule 7-1(c)(2)(A) Plaintiffs' response to the Motion to Dismiss would be due on April 29, 2016 (14 days after filing of Motion to Dismiss without any delay for mailing). In order to more-fully address the issues raised in this pleading, the Plaintiffs request an additional 15-day extension to May 16, 2016 (as the 15<sup>th</sup> day falls on a Saturday, May 14, 2016). This is the first request for an extension to respond

to the Motion to Dismiss and the extension does not interfere with the tendered Case Management Plan (Rec. Doc. No. 120). Undersigned Counsel for the Plaintiffs has contacted Counsel for the Defendants who consents to this request.

**WHEREFORE**, Plaintiffs respectfully request that this Court enter an order extending the time with which to respond to and oppose the Defendants' Motion to Dismiss filed on April 15, 2016 (Rec. Doc. No. 126) to May 16, 2016.

Respectfully submitted,

*/s/ Cassie E. Felder*  
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*/s/ James M. Garner*  
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*/s/ Gladstone N. Jones, III*  
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**COUNSEL FOR PLAINTIFFS AND  
THE PROPOSED CLASS**

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 19<sup>th</sup> day of April, 2016, served a copy of the foregoing upon all counsel of record by CM/ECF filing.

*/s/ James M. Garner*